

MIMBRES

COMMUNICATIONS

28 December, 2017

Marlene H. Dortch, Secretary
Federal Communications Commission
RE: GN Docket No. 17-258

We would like to voice our strong disapproval of the 2017 CBRS Rule Changes proposed in NPRM 17-134.

Mimbres Communications is a Broadband Wireless Access startup serving rural Grant County, New Mexico. After a decade and a half of contract work in and around the fixed wireless access space, the founders made a decision in late 2016 to enter the market as a new service provider. This decision was based in large part on presumed availability of mid-band CBRS spectrum under the 2015 CBRS rules. We are currently offering affordable 100/20 plans based on U-NII (5 GHz) spectrum but are severely limited in where and how we can deliver those services due to increasing usage of the band by consumer devices and limited EIRP in the middle (U-NII-2A/C) portion of the band. CBRS will allow us to offer reliable 100/20 service to larger areas in 2018, with even faster plans in 2019 as new equipment comes to market.

In paragraph 44, the Commission asks, “whether our proposed changes in the term, renewability, and service area of PALs would make them more useful to a wider range of potential licensees.” The answer from us is, “absolutely not.” The proposed change from Census Tract licensing to Partial Economic Areas would force us to bid on a license covering thousands of square miles (and a population more than ten times our addressable market) in order to offer reliable, fast service to the un-served and under-served residents of rural Grant County. Increasing the license term to ten years with a presumption of renewal would further decrease the likelihood that small providers like us would participate in the auctions. We would almost certainly be unable to afford such a license, and if we were somehow successful in obtaining one, the build-out requirements to cover such a large area would require us to seek outside capital for what would become a highly speculative business proposition.

The propagation characteristics of 3.5 GHz spectrum make its value questionable at best for mobile use in rural areas. Census tract-based auctions would allow mobile operators to acquire spectrum in towns where they do have a need while simultaneously allowing fixed BWA providers to acquire spectrum in less-dense areas where they can make effective use of the band. Our county has significant amounts of unutilized 700 MHz spectrum now. The exclusive use model of previous spectrum auctions has denied many residents of the opportunity to benefit from use of those airwaves. Please don't repeat this mistake with the mid-band.

CBRS spectrum is a valuable tool that will allow us to provide services that the large broadband companies have been unwilling or unable to do. We live here, we work here, and we have community relationships the large carriers are simply incapable of maintaining in rural areas.

Thank you;



Kurt Albershardt
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